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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

November 4, 2020

Via ECF

Hon. Katharine H. Parker United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 SO ORDERED:

HON. KATHARINE H. PARKER UNITED STATES MAGISTRATE JUDGE

11/04/2020

Re: Perdomo v. United States of America, 19 Civ. 3378 (KHP)

Dear Judge Parker:

This Office represents the United States of America in the above-referenced action. We submit this letter jointly on behalf of both parties in response to the Court's Order dated September 22, 2020, which granted the parties' request to extend the stay of expert discovery and pretrial deadlines in this case to allow additional time for settlement negotiations. Dkt. No. 41. While the parties have made progress, they need additional time to continue their discussions. The parties thus respectfully request that the Court stay the pending deadlines by an additional 90 days and propose that they submit a joint status letter to the Court by February 4, 2021, to update the Court on whether they have reached a resolution and to propose next steps in this case, including, if necessary, submitting for the Court's consideration an amended case management schedule.

We thank the Court for its consideration of this submission.

Respectfully submitted,

AUDREY STRAUSS

Acting United States Attorney

By: /s/ Jennifer Jude

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cc (via ECF): Attorneys for Plaintiff